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9 Attorney for Defendant  
10 MELINA ESCALANTE

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

|                              |   |                               |
|------------------------------|---|-------------------------------|
| 13 UNITED STATES OF AMERICA, | ) |                               |
|                              | ) | No. CR-16-382-HSG [KAW]       |
| 14 Plaintiff,                | ) |                               |
|                              | ) | <b>STIPULATED MOTION AND</b>  |
| 15 v.                        | ) | <b>PROPOSED ORDER TO</b>      |
|                              | ) | <b>ALLOW DEFENDANTS TO</b>    |
| 16 OSCAR ESCALANTE, et. al., | ) | <b>VISIT TOGETHER FOR THE</b> |
|                              | ) | <b>THANKSGIVING HOLIDAY</b>   |
| 17 Defendant.                | ) |                               |
|                              | ) | No Hearing Requested          |
| 18 _____                     | ) |                               |

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20 1. Defendants Melina Escalante, by and through her counsel  
21 of record Randy Sue Pollock; Ignacio Gonzalez, by and through his  
22 counsel of record John Jordan; and Assistant United States  
23 Attorney Frank Riebli; hereby stipulate and agree that each  
24 defendants' bond may be modified to permit them to be together  
25 with their mother and other family members on Thanksgiving,  
26 November 23, 2017, at Mrs. Escalante's residence in Discovery  
27 Bay, California. Ignacio Gonzalez shall be permitted to travel  
28 to the Northern District of California in order to attend the

1 family celebration on Thanksgiving. The defendants are  
2 instructed not to discuss this case when they are together.

3 Pretrial Services Officer Victoria Gibson has no objection  
4 to this limited modification for Melina Escalante and Pretrial  
5 Services Officer Tim Elder has no objection to this limited  
6 modification for Ignacio Gonzalez.

7 Date: November 21, 2017 Respectfully submitted,

8 \_\_\_\_\_/s/\_\_\_\_\_  
9 RANDY SUE POLLOCK  
Counsel for Melina Escalante

10 Date: November 21, 2017

\_\_\_\_\_/s/\_\_\_\_\_  
11 JOHN JORDAN  
Counsel for Ignacio Gonzalez

12 Date: November 21, 2017

\_\_\_\_\_/s/\_\_\_\_\_  
13 FRANK RIEBLI  
Assistant United States Attorney

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16 SO ORDERED: 11/21/17

  
17 KANDIS A. WESTMORE  
United States Magistrate Judge  
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